

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re: : Case No. 19-55235
:
D&L PROPERTY GROUP CORP., : Chapter 11
:
Debtor. :
_____ :

APPLICATION TO EMPLOY PAUL REECE MARR, P.C.
AS ATTORNEYS FOR DEBTOR IN POSSESSION

COMES NOW D&L PROPERTY GROUP CORP. (the "Debtor"), as debtor in possession in the above-captioned bankruptcy case, and hereby applies to this Court for authority to employ the law firm of Paul Reece Marr, P.C. (the "Law Firm") as its bankruptcy attorneys. In support hereof, the Debtor respectfully represents as follows:

1. On April 2, 2019 (the "Petition Date"), the Debtor filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code") through the offices of the Law Firm. In accordance with §§1107(a) and 1108 of the Bankruptcy Code, the Debtor continues to control and manage its affairs as a debtor in possession. No official committee of unsecured creditors has been appointed pursuant to section 1102 of the Bankruptcy Code.

2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue of the Debtor's chapter 11 case in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. By this application, the Debtor requests that this Court enter an Order authorizing the Debtor to employ the Law

Firm as its bankruptcy counsel in this bankruptcy case pursuant to 11 U.S.C. §327(a). The Debtor has selected the Law Firm, attorneys duly admitted to practice before this Court, because it has considerable experience in bankruptcy, insolvency, corporate reorganization, and debtor/creditor relations and it is well qualified to represent the Debtor in this proceeding.

4. The professional services that the Law Firm is to render include: (a) Providing the Debtor with legal advice regarding its powers and duties as debtor in possession in the continued operation and management of its affairs; (b) Preparing on behalf of the Debtor the necessary applications, statements, schedules, lists, answers, orders and other legal papers pursuant to the Bankruptcy Code; and (c) Performing all other legal services in the Chapter 11 bankruptcy proceeding for the Debtor which may be reasonably necessary.

5. To the best of the Debtor's knowledge, the Law Firm has no connection with the Debtor, its creditors, or any other party in interest herein, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee that would preclude it from representing the Debtor in this Chapter 11 case, and the Law Firm represents no interest adverse to the estate with the respect to any matter on which the Law Firm is to be employed by the Debtor.

6. The Debtor desires to employ the Law Firm to represent it in this chapter 11 bankruptcy case under a general attorney fee and expense retainer in the amount of \$10,000.00, with all compensation and expense reimbursement to be paid to the Law Firm subject to approval by the Court after the filing of an

Application pursuant to 11 U.S.C. §331. To date Leanne Delice, Debtor's President and a shareholder, has delivered the \$1,717.00 Petition filing fee and \$5,000.00 of the \$10,000.00 retainer to the Law Firm. Leanne Delice has agreed to pay the \$5,000.00 remaining balance of the \$10,000.00 retainer on or before April 30, 2019. The Law Firm has filed its attorney disclosure as required under Bankruptcy Rule 2016(b) contemporaneously herewith.

7. The Law Firm has disclosed to the Debtor the hourly fees currently applicable to the professional services to be rendered pursuant to this contract as follows: Paul Reece Marr, Esq. \$350.00 per hour; Paralegal \$125.00 per hour; and clerical \$50.00 per hour. Said hourly fees are subject to adjustment in the ordinary course of business.

8. The aforementioned disclosure of fees is made in an effort to allow the Court to make its determinations as to the reasonableness of the attorney fees charged by the Law Firm. The Debtor has been made aware that the fees charged by the Law Firm are based upon its extensive experience in bankruptcy, insolvency, corporate reorganization and debtor/creditor law governed by the twelve factors set out in Johnson v. Georgia Highway Express, 488 F.2d 714, 717-19 (5th Cir. 1974).

9. Pursuant to Bankruptcy Rule 6003(a), the Law Firm shall not seek entry of a Court Order approving this Application until 21 days after the Petition Date.

WHEREFORE, the Debtor prays that it be authorized to employ and appoint the Law Firm to represent it as the debtor in possession in this bankruptcy case under Chapter 11 of the Bankruptcy Code with all compensation paid or to be paid the Law

Firm being subject to Court approval after notice and hearing,
and that it have such other and further relief as is just and
proper.

Prepared and submitted,
PAUL REECE MARR, P.C.
Debtor's counsel

D&L PROPERTY GROUP CORP.

/s/ Paul Reece Marr
Paul Reece Marr
Georgia Bar No. 471230
300 Galleria Parkway, N.W.
Suite 960
Atlanta, Georgia 30339
770-984-2255

/s/ Leanne Delice
Leanne Delice
Its: President

/s/ Leanne Delice
LEANNE DELICE

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VERIFIED STATEMENT OF PROPOSED ATTORNEY

I, Paul Reece Marr, hereby make solemn oath under penalty of perjury:

1. I make this Verified Statement in connection with the attached *APPLICATION TO EMPLOY PAUL REECE MARR, P.C.* AS ATTORNEYS FOR DEBTOR IN POSSESSION ("Application").

2. I am over the age of eighteen and am competent to make this Verified Statement. All information set forth in this Verified Statement is based upon my personal knowledge, information, or belief.

3. I am an attorney and counselor at law, duly admitted to practice in the State of Georgia and in this Court, and I am employed by Paul Reece Marr, P.C. (the "Law Firm") as an attorney. I maintain my office for the practice of law at 300 Galleria Parkway, NW, Suite 960, Atlanta, GA 30339. My office telephone number is 770-984-2255. My office email address is paul.marr@marrlegal.com

4. I have no connection with the above-named Debtor, its creditors, their respective attorneys and accountants, the United States Trustee, any person employed in the office of the

United States Trustee, or any other party in interest herein other than as may be disclosed herein or in the Application. I represent no interest adverse to the debtor or the estate in the matters upon which I am to be engaged for the debtor, and I am a "disinterested person" within the contemplation of 11 U.S.C. Section 101(13).

Date: April 1, 2019

/s/ Paul Reece Marr
Paul Reece Marr
GA Bar # 471230

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CERTIFICATE OF SERVICE

This is to certify that I have on this day electronically filed the foregoing APPLICATION TO EMPLOY PAUL REECE MARR, P.C. AS ATTORNEYS FOR DEBTOR IN POSSESSION using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case filing program:

- Office of the United States Trustee
ustpreion21.at.ecf@usdoj.gov

I further certify that on this day I caused a copy of this document to be served via first class U.S. Mail, with adequate postage prepaid, on the following parties at the address shown for each:

D&L Property Group Corp.
Attn: Brandon Florez
110 Chippewa Court
Riverdale, GA 30296

D&L Property Group Corp.
Attn: Leanne Delice
6150 Reseda Blvd
Reseda CA 91335

This the 1st day of April, 2019.

/s/ Paul Reece Marr
Paul Reece Marr
GA Bar No. 471230

Paul Reece Marr, P.C.
300 Galleria Parkway, N.W.; Suite 960
Atlanta, GA 30339
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